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June 13, 2025

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RE: *Gancarz et al. v. Capito*, W.D. Wash. No. 2:23-cv-01113-RAJ

We represent the defendant named in the above-referenced lawsuit. We will file a responsive pleading on June 27, 2025.

Pursuant to RCW 4.105.020(1), this is to provide plaintiffs with written notice that, on June 27, we intend to file a special motion pursuant to RCW 4.105.020(2), for expedited relief to dismiss the following causes of action:

Cause of Action 2 - Common-law tort - Invasion of Privacy – Intrusion on Private Affairs

Cause of Action 3 - Invasion of Privacy – Giving Publicity to Private Facts

Cause of Action 4 -- Virginia Computer Trespass Act, Civil Action, § 18.2-152.12  
Virginia Code – plaintiff Paul Garcanz

Cause of Action 5 -- Maryland Unauthorized Access to Computers Act, Civil Action, § 7-302 of Maryland Code – plaintiff Daniel Turechi

Very truly yours,  
/s/ Matthew Kellegrew  
Matthew Kellegrew  
WSBN 61354